

**In the Matter Of:**  
**Andrews vs Autoliv Japan**

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**Mariusz Ziejewski, PhD**

*October 12, 2018*

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SUITE 265  
ATLANTA, GA 30339

Plaintiff's Exhibit

PX 1159

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Andrews vs Autoliv Japan

Mariusz Ziejewski, PhD

10/12/2018

1 testimony?

2 A. No.

3 Q. Which of the cases on this list, doctor,  
4 involve allegations that the driver's side airbag  
5 should have deployed but did not?

6 A. Cannot tell you.

7 Q. But you have testified in cases like that?

8 A. Oh, sure.

9 Q. Okay.

10 A. And I was -- we know the airbags can  
11 malfunction. Whether they don't deploy or maybe  
12 they are not effective because damage to the  
13 steering column or other reasons.

14 Q. Have you ever testified in a case where  
15 there was a frontal impact speed of 35 miles per  
16 hour or more where the driver's side airbag  
17 failed to deploy?

18 A. I am pretty sure I did but I cannot tell  
19 you.

20 Q. You can't tell me which one of those cases  
21 it is?

22 A. No, I can't.

23 Q. And you can't recall what the injuries were  
24 in that case?

25 A. At 35 miles an hour, no airbag deployment,

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1 probably death.

2 Q. And why do you say that?

3 A. Well, considering the limitations, how did  
4 some of the seatbelts are designed, I believe  
5 that there is not much choice. Like in this case  
6 the seatbelt did not function, did not restrain  
7 the occupant, period, period. So if you accept  
8 that as a state of art in the seatbelt design,  
9 you don't have an airbag you are screwed  
10 essentially. You are going to die because  
11 seatbelt will not protect you. That is the  
12 problem.

13 Q. How many times do you think you've testified  
14 in a case involving a frontal collision, speed of  
15 35 miles per hour or more where the driver's side  
16 airbag failed to deploy?

17 A. I don't know.

18 Q. Just estimate, five times, 100 times, just  
19 trying to get a sense?

20 A. No. There was some and whether or not there  
21 were half a dozen of those cases, I don't know.  
22 Deployment is a one thing, the other thing is the  
23 airbag being shoved to the side so it's not  
24 efficient, effective. To me obviously two  
25 different things, but I cannot distinguish cases,